

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONRAI MEMORY LTD.,

Plaintiff,

v.

ADVANCED MICRO DEVICES, INC.

Defendant.

Case No. 6:22-cv-229

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT
AGAINST ADVANCED MICRO DEVICES, INC**

This is an action for patent infringement arising under the Patent Laws of the United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Sonrai Memory Ltd. (“Plaintiff” or “Sonrai”) makes the following allegations against Defendant Advanced Micro Devices, Inc. (“Defendant”):

INTRODUCTION

1. This complaint arises from Defendant’s unlawful infringement of the following United States patents owned by Sonrai: United States Patent No. 8,193,792 (“the ’792 Patent” or the “Asserted Patent”).

PARTIES

2. Plaintiff Sonrai Memory Limited is an Irish company, having its principal place of business at Suite 23, The Hyde Building, Carrickmines, Dublin 18, Ireland. Sonrai is the sole owner by assignment of all right, title, and interest in the Asserted Patent.

3. On information and belief, Defendant Advanced Micro Devices, Inc. is a corporation organized under the laws of the State of Delaware, with its principal place of business at 2485 Augustine Drive, Santa Clara, California 95054.

JURISDICTION AND VENUE

4. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Defendant in this action because Defendant has committed acts within this District giving rise to this action, and has established minimum contacts with this forum such that the exercise of jurisdiction over Defendant would not offend traditional notions of fair play and substantial justice. Defendant, directly and through subsidiaries or intermediaries, has committed and continues to commit acts of infringement in this District by, among other things, importing, offering to sell, and selling products that infringe the Asserted Patent.

6. Venue is proper in this District under 28 U.S.C. § 1400(b). Upon information and belief, Defendant has transacted business in this District and has committed acts of direct infringement in this District by, among other things, making, using, offering to sell, selling, and importing products that infringe the Asserted Patent. Defendant has a regular and established place of business in the District, including offices at 7171 Southwest Parkway, Austin, Texas 78735.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 8,193,792

7. Sonrai realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

8. Sonrai owns by assignment all rights, title, and interest in U.S. Patent No. 8,193,792, titled "Circuit and method for operating a circuit." A copy of the '792 Patent is attached as Exhibit 1.

9. On information and belief, Defendant offers for sale, sells, and/or imports certain products (“Accused Products”), such as processors using its Zen architecture, that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’792 Patent. A claim chart comparing independent claim 1 of the ’792 Patent to a representative Accused Product is attached as Exhibit 2 and is incorporated by reference herein.

10. By offering for sale, selling and/or importing into the United States the Accused Products, Defendant has injured Sonrai and is liable for infringement of the ’792 Patent pursuant to 35 U.S.C. § 271.

11. As a result of Defendant’s infringement of the ’792 Patent, Sonrai is entitled to monetary damages in an amount adequate to compensate for Defendant’s infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court.

PRAYER FOR RELIEF

WHEREFORE, Sonrai respectfully requests that this Court enter:

a. A judgment in favor of Sonrai that Defendant has infringed, either literally and/or under the doctrine of equivalents, the ’792 Patent;

b. A judgment and order requiring Defendant to pay Sonrai its damages, costs, expenses, and pre-judgment and post-judgment interest for Defendant’s infringement of the ’792 Patent;

c. A judgment and order requiring Defendant to provide an accounting and to pay supplemental damages to Sonrai, including without limitation, pre-judgment and post-judgment interest;

d. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Sonrai its reasonable attorneys' fees against Defendant; and

e. Any and all other relief as the Court may deem appropriate and just under the circumstances.

DEMAND FOR JURY TRIAL

Sonrai, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Dated: March 2, 2022

Respectfully submitted,

/s/ Reza Mirzaie

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendant on March 2, 2022 via electronic service.

/s/ Reza Mirzaie
Reza Mirzaie